

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

DSCF-STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS LINDA M. MALONE
(APWU/USPS-T1-1-6)
(January 29, 2014)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Linda M. Malone (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

As used in these interrogatories, the terms listed below are defined as follows:

The term "document" means all writings of any kind, including the originals and all copies, whether different from the originals by reason of any notations made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations such as telephone calls, meetings or other communications, bulletins, computer printouts, teletypes, telefaxes, worksheets, and all drafts, alterations, modifications changes and amendments of any kind to the foregoing); graphic or oral records or representations of any kind (including without limitation photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures); and electronic, mechanical or electrical records or representations of any kind (including without limitation e-mails, computer files, tapes, cassettes, discs, recordings).

The term "all documents" means every document as above defined known to

USPS and every such document which can be located or discovered by reasonably diligent efforts.

The term "Postal Service" includes all agents, employees, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors and subcontractors to the Postal Service, and the Postal Service Office of Inspector General (OIG).

The term "person" means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term "identify," when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term "identify," when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

For each interrogatory response, identify all individuals responsible for providing the response who will be able to confirm the response under oath.

For any objection to or other refusal to answer any portion of any interrogatory, provide all information requested by that portion of the request to which there is no objection, or which an answer is not refused. If an objection is made to an interrogatory on the ground that it is too broad, provide all information determined by USPS to be discoverable. If an objection is made to an interrogatory on the ground that to provide the requested discovery would constitute an undue burden, provide all requested documents that can be supplied without undertaking what is claimed an undue burden. For those portions of any interrogatory to which an objection is raised, or which a complete answer is otherwise refused, state each reason for the objection or declination. If an objection is made to any portion of any interrogatory on the ground that it seeks privileged or otherwise non-discoverable information, state the privilege or other protection asserted, identify all persons to whom the document that is claimed to be non-discoverable have been communicated or displayed, and identify all documents that constitute, contain or reflect such information; and provide a separate list of all asserted privileged documents that identifies the author, recipient date and general subject matter of each document.

In any instance where a response to an interrogatory cannot be provided in full, so state and then respond to that portion of the interrogatory to which USPS can respond.

You should supplement the responses to answers to these interrogatories in accordance with the provisions of Rule 26(e) of the Federal Rules of Civil Procedure.

Respectfully submitted,

Darryl J. Anderson
Kelly Beck
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-1 In response to PR/USPS-T1-15 the Postal Service provide LR-N2014-1-13. It seems to show that the number of cancellation runs that had to be extended past their usual time increased during the Suburban Maryland load leveling test period.

- a) Was this due to the test being done in December? If not, is there another explanation for this result?
- b) Will the full results of this test be submitted to the record prior to the record closing?
- c) When do you anticipate having the full results of this test available?

APWU/USPS-T1-2 On page 15 of your testimony, you indicate the results of the New Jersey test “validated the expectation that targeted workload leveling could improve local operations.” Please describe other options considered by the Postal Service to improve local operations other than degrading service standards and increasing the associated operational problems for mailers?

APWU/USPS-T1-3 Can you provide piece counts of the mail that was actually delayed for an additional day beyond the current service standards during the New Jersey and Suburban Maryland tests?

APWU/USPS-T1-4 Can you provide the percentage or approximate percentage of standard mail that was actually delayed for an additional day beyond the current service standards during the New Jersey and Suburban Maryland tests?

APWU/USPS-T1-5 Has the Postal Service made estimates of how much mail volume, mail revenue and mail contribution it may lose by degrading the service standards for DSCF mail? If so, please provide that information.

APWU/USPS-T1-6 Has USPS surveyed mailers to determine how many DSCF-Standard mailers want Monday delivery and may change their drop dates under the proposed new standards so as to receive a Monday delivery? If so, what is the estimate of the number mailers and associated volume?